

Dear Commission Members:

I respectfully request that sub-bands be created in order to separate wideband modes (AM/SSB/SSTV) from narrowband modes (CW/Digital) in order to prevent mixed mode interference from occurring here.

The notion of "open bandplanning" or "all modes everywhere - all the time" is fraught with peril. We need only to listen to the high-end of the CW band on 28Mhz to recognize that even a modest intrusion of AM CB activity creates exasperating interference to narrowband mode operations being attempted there. If we create a spectrum management program that throws all caution to the wind (and allows a complete mixing of modes all across our new band) I fear we will be making a serious mistake which we will live to regret sooner rather than later.

Please adopt CW/and other digital sub-bands on this new band and set aside other specific areas for wideband mode activity such as AM/SSB/SSTV. Please do NOT establish an open, free-ranging band management plan on this new amateur band!

By so doing, we will preserve "relative order" among amateur service operations which is entirely consistent with our existing mode sub-bands which exist on 3.5 - 144Mhz.

Thank you for the opportunity to comment on this matter.

Very truly yours,

Jeffrey T. Briggs, K1ZM
Co-Sponsor of RM-10352